

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|---|---|------------------------|
| NHC LLC, |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No. 2019 C 6332 |
| |) | |
| CENTAUR CONSTRUCTION COMPANY, <i>et al.</i> , |) | Judge Matthew Kennelly |
| |) | |
| Defendants. |) | |

**PLAINTIFF/JUDGMENT CREDITOR'S STATEMENT REGARDING ADDITIONAL
AMOUNTS DETAILED IN US BANK RECORDS**

By its Order entered May 30, 2025 (Dkt. No. 682), the Court directed Plaintiff/Judgment Creditor NHC LLC (“NHC”) to “submit to the Court [. . .] what additional amounts detailed in the US Bank records have been impermissibly transferred or dissipated that have not already been addressed in prior contempt rulings.” (*Id.* at 10.) In compliance with the Court’s Order, NHC states that it has identified the following transfers or dissipation of funds from US Bank accounts owned or controlled by judgment debtors Spiro Tsaparas (“Tsaparas”) and held in the name of Tsaparas, Centaur Construction Co., or Triton Marine Holdings LLC occurring after May of 2023 which have not been addressed in prior contempt rulings:

| Account Number | Month | Funds Transferred/Dissipated |
|----------------|---------|------------------------------|
| 5923 | 6/2023 | \$0 |
| 5923 | 7/2023 | \$0 |
| 5923 | 8/2023 | \$0 |
| 5923 | 9/2023 | \$3,500.00 |
| 5923 | 10/2023 | \$0 |
| 5923 | 11/2023 | \$0 |
| 5923 | 12/2023 | \$0 |
| 5923 | 1/2024 | \$0 |
| 5923 | 2/2024 | \$0 |
| 5923 | 3/2024 | \$0 |
| 5923 | 4/2024 | \$0 |
| 5923 | 5/2024 | \$0 |

| | | |
|--------------|-------------------------|-------------------|
| 5923 | 6/2024 | \$0 |
| 5923 | 7/2024 | \$3.34 |
| 5923 | 8/2024 | \$0 |
| 5923 | 9/2024 | \$29.95 |
| 5923 | 10/2024 | \$38.95 |
| 5923 | 11/2024 | \$0 |
| Total | 6/2023 – 11/2024 | \$3,572.24 |

| Account Number | Month | Funds Transferred/Dissipated |
|----------------|----------------|------------------------------|
| 1745 | 11/2023 | \$0 |
| 1745 | 12/2023 | \$100 |
| Total | 12/2023 | \$100 |

| Account Number | Month | Funds Transferred/Dissipated |
|-------------------|-------------------------|------------------------------|
| 3011 ¹ | 6/2023 | \$8,936.00 |
| 3011 | 7/2023 | \$12,736.00 |
| 3011 | 8/2023 | \$12,656.00 |
| 3011 | 9/2023 | \$12,692.00 |
| 3011 | 10/2023 | \$22,135.00 |
| 3011 | 11/2023 | \$44,415.26 |
| Total | 6/2023 – 11/2023 | \$113,570.26 |

| Account Number | Month | Funds Transferred/Dissipated |
|----------------|--------------------------------|------------------------------|
| 8746 | 6/2023 | \$4,051.46 |
| 8746 | 1/2024 | \$28.95 |
| 8746 | 2/2024 | \$29.95 |
| 8746 | 3/2024 | \$29.95 |
| 8746 | 4/2024 | \$29.95 |
| 8746 | 5/2024 | \$29.95 |
| 8746 | 6/2024 | \$29.95 |
| 8746 | 7/2024 | \$29.95 |
| 8746 | 8/2024 | \$29.95 |
| 8746 | 9/2024 | \$0 |
| Total | 6/2023; 1/2024 – 9/2024 | \$4,290.06 |

| Account Number | Month | Funds Transferred/Dissipated |
|----------------|--------|------------------------------|
| 8753 | 2/2024 | \$45,485.49 |
| 8753 | 3/2024 | \$28,030.32 |
| 8753 | 4/2024 | \$54,711.85 |
| 8753 | 5/2024 | \$33,170.12 |
| 8753 | 6/2024 | \$39,082.12 |

¹ US Bank account number ending in 3011 is the subject of another pending motion for rule to show cause regarding transfers made through Triton Marine Holding, LLC. (Dkt. No. 647.) As the Court has not yet ruled on that motion, Account 3011 is included for completeness.

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|--|---------------------------------|---------------------|
| 8753 | 7/2024 | \$29,473.75 |
| 8753 | 8/2024 | \$4,849.72 |
| 8753 | 9/2024 | \$12,811.61 |
| 8753 | 10/2024 | \$2,277.71 |
| 8753 | 11/2024 | \$1,828.33 |
| 8753 | 12/2024 | \$3,390.53 |
| 8753 | 1/2025 | \$2,489.51 |
| Gross Total | 1/2024 – 1/2025 | \$257,601.06 |
| Less Cash Transfers addressed in Dkt. No. 592- 12 | 1/2024 – 9/2024; 12/2024 | \$91,921.50 |
| Net Total | | \$165,679.56 |

| Account Number | Funds Transferred/Dissipated |
|----------------|------------------------------|
| 5923 | \$3,572.24 |
| 1745 | \$100 |
| 3011 | \$113,570.26 |
| 8746 | \$4,290.06 |
| 8753 | \$165,679.56 |
| Total | \$287,212.12 |

The additional amounts transferred or dissipated from the US Bank accounts detailed above are an accurate reflection of the amounts described in the US Bank records NHC has received from the Judgment Debtors to date. NHC may petition the Court for additional relief concerning any amounts impermissibly transferred or dissipated described in other US Bank records (or bank records from other banking institutions) which have not yet been provided to NHC, including impermissible transfers or dissipations occurring in the future. NHC will supply the Court with the US Bank records supporting the transfers/dissipations detailed in this Statement upon request.

Dated: June 6, 2025

Respectfully submitted,

NHC LLC

By: /s/ Zachary J. Watters

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CERTIFICATE OF SERVICE

I hereby certify that, on June 6, 2025, a true and correct copy of the foregoing **PLAINTIFF/JUDGMENT CREDITOR'S STATEMENT REGARDING ADDITIONAL AMOUNTS DETAILED IN US BANK RECORDS** was electronically filed with the Clerk of the Court using the Court's CM/ECF system and thereby served electronically by the CM/ECF system on all counsel of record.

/s/ Zachary J. Watters
An Attorney for NHC LLC